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13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **SAN FRANCISCO DIVISION**

16 MAXIMILIAN KLEIN, et al.,

17 Case No. 20-cv-08570-JD

18 Plaintiffs,

19 Hon. James Donato

20 v.

21 **PROOF OF SERVICE OF DOCUMENTS
IN SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CLEVELAND RESEARCH COMPANY,
LLC'S MATERIAL SHOULD BE SEALED**

22 META PLATFORMS, INC.,

23 Defendant.

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1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, could and would testify competently to them.

6 2. On April 17, 2023, I served on nonparty Cleveland Research Company, LLC (“CRC”)
7 a copy of (1) the Declaration of Brian J. Dunne in Support of Advertiser Plaintiffs’ Administrative
8 Motion to Consider Whether Cleveland Research Company, LLC’s Material Should Be Sealed, filed in
9 connection with the concurrently filed discovery dispute letter; and (2) a partially-unredacted version
10 of the discovery dispute letter, redacting information in the discovery dispute letter designated
11 “Confidential” or “Highly Confidential” by Defendant Meta Platforms, Inc., and nonparty Netflix, Inc.,
12 and highlighting in green those portions of the letter referencing or reflecting the contents of documents
13 and information designated by CRC as “Confidential” or “Highly Confidential” under the Stipulated
14 Protective Order (Dkt. No. 314).

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on April 17, 2023, in Austin, Texas.

17 /s/ Brian J. Dunne

18 Brian J. Dunne

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